REMARKS

The examiner is thanked for the performance of a thorough search. By this amendment, Claims 7, 8, 11, 18, 21, 28, 31, 38, and 41 have been amended. No claims have been cancelled or added. Hence, Claims 1-42 are pending in the application. The amendments to the claims as indicated herein do not add any new matter to this application. Furthermore, amendments made to 7, 8, 11, 18, 21, 28, 31, 38, and 41 as indicated herein have been made to exclusively improve readability and clarity of the claims and not for the purpose of overcoming alleged prior art.

Each issue raised in the Office Action mailed October 23, 2003 is addressed hereinafter.

I.   OBJECTIONS TO THE CLAIMS

The Office Action objects to Claim 3, alleging that "the particular name" lacks antecedent basis. The term "a particular name" is introduced in Claim 1: "receiving a request including data indicating a particular name of the plurality of names." Claim 3 depends indirectly from Claim 1, and therefore the objection is believed to be incorrect.

The Office Action objects to Claims 1 and 42 because of alleged informalities, stating that the claims "are not within the technological arts, software per se." The Office Action suggests replacing "method" with "computer-implemented method". The objection is respectfully traversed.

A requirement for a claim to be "within the technological arts" or not directed to "software per se" is not a recognized basis for an objection for informalities under 35 U.S.C. § 112 or any other statute or rule, and none is cited in the Office Action. The applicant's representative is aware that the Office recently began rejecting claims under 35 U.S.C. § 101 based on a purported "technological arts prong" of the case law relating to computer-related claims. In these rejections, other Examiners in the same art unit as the present Examiner have

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issued rejections that contend, in part, that amendment of the preamble is insufficient to overcome the requirements of the law. While the applicant fervently believes that rationale and even the existence of the new "prong" are wrong, the present Office Action suggests an amendment to the preamble of the claim and the applicant is not willing to make that amendment only to have it ruled insufficient in a later Office Action potentially issued by a different Examiner. The Office's inconsistency on this point is an unfair burden on applicants and their representatives. Moreover, Claim 1 as presently presented refers in its body to "storing ... in a database of concepts" and working with data from the database. Claim 42 as originally filed recites "computer implemented steps." Claims 1 and 42 therefore recite subject matter that is sufficiently within the technological arts for purposes of either § 101 or § 112, and the objection is respectfully overcome without amendment of the claims.

II.   ISSUES RELATING TO PRIOR ART

The Office Action rejected Claims 1-42 under 35 U.S.C. § 102(e) as allegedly unpatentable over US Patent No. 6,453,312 granted to Goiffon et al. ("Goiffon"). The rejection is respectfully traversed.

Anticipation under 35 U.S.C. § 102 requires a reference to teach or disclose each and every element, limitation, or step of a claim. Since Claims 1-42 each include at least one element not found in Goiffon, the Goiffon patent does not anticipate Claims 1-42 under 35 U.S.C. § 102.

1.   CLAIMS 1, 12, 22

Although Claims 1, 12, and 22 are not the same, because the Office Action has applied the same reasoning for each of Claims 1, 12, and 22, the following remarks will consider these claims together.

The Office Action alleges that Goiffon teaches:

"storing a plurality of names for a single entity associated with the enterprise as a first plurality of corresponding concepts in a database of concepts and relationships among concepts (col 4, lines 3-15), which database describes a plurality of entities associated with the enterprise (col 4, lines 4-8; col 10, 15-20);"

"designating a first concept of the first plurality of corresponding concepts as a normative concept (col 11, lines 55-60; col 12, lines 1-35);"

"receiving a request including data indicating a particular name of the plurality of names (col 14, lines 35-50); and"

"in response to receiving the request, sending a response including information associated in the database with the first concept (col 14, line 65 – col 15 line 10; col 15, lines 25-40)."

The foregoing rejection is incorrect.

Each of the features of Claims 1, 12, and 22 is individually lacking in the prior art of record. For example, Goiffon does not teach the feature of "in response to receiving the request, sending a response including information associated in the database with the first concept". In the cited section, col 14, line 65 – col 15 line 10; col 15, lines 25-40, Goiffon teaches a system for providing search results for a word in a query and for variants of the word. In Goiffon, after submitting a query, the user must choose one or more variants from among a set of variants. A search is then performed on all of the selected variants and the search results are provided to the user.

In Claims 1, 12, 22, techniques are provided for, "in response to receiving the request, sending a response including information associated in the database with the first concept." That is, after receiving a query, a normative concept for the query is determined ("the first concept"). The normative concept is then used to perform the search. The techniques in Claims 1, 12, 22

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refine the search results and provide only results for the normative concept, thereby automatically providing a refined, focused search without requiring the user to be able to pick or choose the normative concept among a set of word variants.

In Goiffon, on the other hand, after submitting a query, the user must choose one or more variants on a word in the query. A search is then be performed on all of the selected variants, and the user receives a large set of unfocused results.

As Goiffon does not teach, among other things, the feature of "in response to receiving the request, sending a response including information associated in the database with the first concept," Goiffon could not possibly teach Claims 1, 12, or 22. For these reasons, the rejection is respectfully traversed.

2.   CLAIM 32

The Office Action alleges that Goiffon teaches:

"a database of concepts and relationships among concepts describing a plurality of
        entities associated with the enterprise (col 4, lines 1-20; col 5, lies 1-10); and"
"a processor configured to perform the steps of (FIG. 1)"
"storing a plurality of names for a single entity associated with the enterprise as a first

plurality of corresponding concepts in the database (col 4, lines 3-15);"

"indicating a first concept of the first plurality of corresponding concepts; (col 4, lines

15-25; col 11, lines 55-60; col 12, lines 1-35);"

"receiving a request including data indicating a particular name of the plurality of names

(col 14, lines 35-50); and"

"in response to receiving the request, sending a response including information associated

in the database with the first concept (col 14, line 65 – col 15 line 10; col 15, lines 25-40)."

The foregoing rejection is incorrect.

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Each of the features of Claim 32 is individually lacking in the prior art of record. For example, as described in the remarks above, Goiffon does not teach the feature of "in response to receiving the request, sending a response including information associated in the database with the first concept". As Goiffon does not teach, among other things, the feature of "in response to receiving the request, sending a response including information associated in the database with the first concept," Goiffon could not possibly teach Claim 32. Therefore, the rejection is respectfully traversed.

3.   CLAIM 2-11, 13-21, 23-31, and 33-41

Claims 2-11, 13-21, 23-31, and 33-41 were rejected in the Office Action and each depends directly or indirectly from Claims 1, 12, 22, or 32 and further limits that claim. The dependent claims also incorporate each and every feature of the independent claim from which they depend. Since independent Claims 1, 12, 22, or 32 are allowable, as discussed above, Claims 2-11, 13-21, 23-31, and 33-41 are also allowable. In addition, each of the dependent Claims 2-11, 13-21, 23-31, and 33-41 independently introduces one or more features that render it independently patentable over the prior art of record.

Consider Claims 2, 13, 23, 33. Each of these claims is different. However, since the Office Action treats them together, they are discussed together here. Regarding Claims 2, 13, 23, 33, the Office Action alleges that Goiffon teaches:

"storing in the database a first relationship of a first relationship type, the first
relationship defined for the first concept and an alternative concept of the first
plurality of corresponding concepts (col 12; lines 1-35); and"

"storing in the database a second relationship of a second relationship type between the
first concept and a second concept not among the first plurality of corresponding
concepts, wherein the second concept indicates the information included in the
response. (col 11, lines 50-60)"

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First, as described above, Goiffon does not teach a first, normative concept. Therefore, Goiffon could not possibly teach the features of Claims 2, 13, 23, and 33.

Further, Goiffon does not teach "storing in the database a second relationship of a second relationship type between the first concept and a second concept not among the first plurality of corresponding concepts, wherein the second concept indicates the information included in the response." Since Goiffon does not teach a normative concept, Goiffon could not possibly teach storing a relationship between a normative concept and another concept and returning information associated with the second concept for a query that indicates the normative concept. Therefore, since Goiffon does not teach, among other things, this feature, Goiffon could not possibly teach Claims 2, 13, 23, and 33.

As another example, consider claims 4, 15, 25, and 35. These claims are different. However, the Office Action treats these together, so the claims will be remarked upon together. As stated above each of these claims depend directly or indirectly from Claims 1, 12, 22, 32. Claims 1, 12, 22, 32 represent patentable subject matter, and therefore, Claims 4, 15, 25, 35 also represent patentable subject matter. In addition each of these claims each introduce at least one feature that makes it separately patentable over the prior art of record. For example, the Office Action alleges that Goiffon discloses the features of the independent claims plus "wherein the request does not include data indicating a first name corresponding to the first concept (FIG. 5; col 15, lines 1-40)." This is not taught in Goiffon, and is, in fact, impossible in Goiffon. In the cited section, a user chooses a number of word variants on which to perform a search and the system returns search results for those word variants. Essentially, Goiffon provides a way for a user to manually expand a search. Claims 4, 15, 25, and 35, however, teach receiving a request that does NOT include a first name corresponding to a first (normative) concept, and yet still "in

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response to receiving the request, sending a response including information associated in the database with the first concept." That is, Claims 4, 15, 25, and 35, a user can submit a request indicating a particular name and automatically receiving back a response that corresponds to the normative concept for that particular name. This is not possible in Goiffon. Therefore, this rejection is incorrect. Withdrawal of this rejection is respectfully requested.

4.   CLAIM 42

Regarding Claim 42, the Office Action alleges that Goiffon teaches:

"A method of responding to a request for data about an enterprise using a data store that comprises a stored plurality of names for a single entity associated with the enterprise (col 4, lines 1-25; col 5, lines 3-20), a first plurality of corresponding concepts in a database of concepts and relationships among concepts (col 4, lines 5-20), which database describes a plurality of entities associated with the enterprise, and wherein a first concept of the first plurality of corresponding concepts is identified as a normative concept (col 23, lines 10-30), the method comprising the computer-implemented steps of"

"receiving a request including data indicating a particular name of the plurality of names (col 14, lines 35-50); and"

"in response to receiving the request, sending a response including information associated in the database with the first concept (FIG. 5; col 14, line 65 – col 15, line 10; col 15, lines 25-40)."

The foregoing rejection is incorrect.

Each of the features of in Claims 42 is individually lacking in the prior art of record. For example, as described above with respect to Claims 1, 12, 22, and 32, Goiffon does not teach the feature of "in response to receiving the request, sending a response including information

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associated in the database with the first concept." As Goiffon does not teach, among other things, the feature of "in response to receiving the request, sending a response including information associated in the database with the first concept," Goiffon could not possibly teach Claim 42. For these reasons, the rejection is respectfully traversed.

III.   CONCLUSIONS & MISCELLANEOUS

For the reasons set forth above, it is respectfully submitted that all of the pending claims, as originally filed or as currently amended, are now in condition for allowance. Therefore, the issuance of a formal Notice of Allowance is believed next in order, and that action is most earnestly solicited.

The supplemental Declaration and Power of Attorney conforming to 37 C.F.R. 1.67 (a) and 37 C.F.R. 1.34 (b) is submitted herewith. The deficiency in the original declaration was an un-initialed correction of the address of Ms. Sima Yazdani. Since the deficiencies in the original declaration relate to a single inventor, the supplemental Declaration and Power of Attorney needs only to be signed only by the inventor to which the change made to overcome the deficiency applies (37 C.F.R. 1.67 (a) (2)). Therefore, the Declaration and Power of Attorney submitted herewith, signed only by Ms. Yazdani, satisfies the requirement stated in the Office Action to submit a supplemental oath or declaration conforming to 37 C.F.R. 167 (a).

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

A petition for extension of time, to the extent necessary to make this reply timely filed, is hereby made. If applicable, a law firm check for the petition for extension of time fee is enclosed herewith. If any applicable fee is missing or insufficient, throughout the pendency of this application, the Commissioner is hereby authorized to any applicable fees and to credit any overpayments to our Deposit Account No. 50-1302.

Respectfully submitted,

HICKMAN PALERMO TRUONG & BECKER LLP

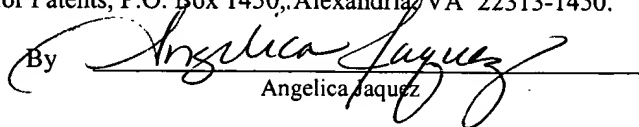Dated: __January 20, 2004__

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CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Mail Stop Non-Fee Amendment, Commissioner for Patents, P.O. Box 1450,. Alexandria, VA 22313-1450.

On __January 20, 2004__   By _____
                              Angelica Jaquez